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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

In re GROUPON MARKETING AND
SALES PRACTICES LITIGATION

Case No. 3:11-md-02238-DMS-RBB

**DECLARATION OF JOE HARROW IN
SUPPORT OF JOINT RESPONSE TO
OBJECTIONS TO CLASS ACTION
SETTLEMENT**

Date: September 7, 2012
Time: 1:30 p.m.
Judge: Hon. Dana M. Sabraw
Courtroom: 10

1 I, Joe Harrow, declare:

2 1. I am the Director of Customer Service at Groupon. I have personal knowledge of
3 the matters set forth in this Declaration and if called as a witness could and would testify
4 competently thereto.

5 2. Groupon prides itself on the quality of its customer service and when contacted by
6 a dissatisfied consumer, will attempt to rectify the situation. However, Groupon has never
7 guaranteed consumers an automatic refund upon request for any reason.

8 3. Consumers request refunds for myriad reasons. Groupon handles consumer
9 complaints and requests for refund on an individualized basis and has always done so. Groupon
10 may issue refunds under certain circumstances, but it has never been Groupon's policy to issue an
11 automatic refund any time a consumer invokes the "Groupon Promise."

12 4. The "Groupon Promise," the wording of which varied slightly during the Class
13 Period, is a customer satisfaction guarantee. The Groupon Promise is intended to assure
14 consumers that if a consumer purchases a Groupon, uses the Groupon, and is dissatisfied with the
15 goods or services received from the merchant, Groupon will make every effort to make it right.
16 The promise is intended to address situations in which the customer used a Groupon Voucher and
17 is in good faith dissatisfied with the product or service received.

18 5. The Groupon Promise is *not* intended to address situations where a consumer
19 simply failed to use a Groupon Voucher before the promotional value expires or changed his or
20 her mind about the goods or services purchased.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed this
22 23th day of August, 2012, in Chicago, IL.

23 s/ 
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CERTIFICATE OF SERVICE

I hereby certify that on August 24, 2012, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 24, 2012.

s/ John J. Stoia, Jr.
JOHN J. STOIA, JR.

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